

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,
Debtor.

Bankruptcy Case No. 13-53846

Judge Thomas J. Tucker

Chapter 9

***EX PARTE* MOTION OF THE CITY OF DETROIT
FOR ENTRY OF AN ORDER AUTHORIZING A
BRIEF IN EXCESS OF THE PAGE LIMIT**

The City of Detroit (“City”), by its undersigned counsel, Miller, Canfield, Paddock and Stone, P.L.C., files this *ex parte* motion for entry of an order authorizing the City to file a 22-page *Reply in Support of Its Motion to Enforce Plan of Adjustment and Require 30-Year Amortization of the UAAL in the Police and Fire Retirement System Pension Plan* (“Reply”), and states as follows:

1. On August 3, 2022, the City filed its *City of Detroit’s Motion to Enforce Plan of Adjustment and Require 30-Year Amortization of the UAAL in the Police and Fire Retirement System Pension Plan*. (“Motion,” Doc. No. 13602.)

2. On September 9, 2022, the Police and Fire Retirement System (“PFRS”) filed an *ex parte* motion, seeking the Court’s leave to file a 40-page response brief. (Doc. No. 13632.) The Court granted this request on the same day. (Doc. No. 13633.)

3. After receiving the Court’s leave, the PFRS filed its *Response to City of Detroit’s Motion to Enforce Plan of Adjustment and Require 30-Year*

Amortization of the UAAL in the Police and Fire Retirement System Pension Plan
[ECF No. 13602] (“Response,” Doc. No. 13634).

4. The Response is 40 pages long and contains 11 exhibits that are more than 900 pages long altogether.

5. The City is prepared to file its Reply with this Court. However, the length of the Reply exceeds the seven-page limit provided by the local rules. E.D. Mich. LBR 9014-1(f).

6. In view of the complexity and the importance of the issues addressed by the Motion, Response, and Reply, the City asks this Court for leave to file a Reply that is twenty-two (22) pages in length.

WHEREFORE the City respectfully requests that the Court enter an order, substantially in the form attached as **Exhibit 1**, granting the City an enlargement of the page limit from seven to 22 pages for its Reply.

Dated: October 31, 2022

MILLER, CANFIELD, PADDOCK AND
STONE, P.L.C.

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Attorneys for the City of Detroit

SUMMARY OF ATTACHMENTS

The following documents are attached to this Motion, labeled in accordance with E.D. Mich. LBR 9014-1(c).

Exhibit 1 Proposed Form of Order

Exhibit 2 None [Motion Seeks Ex Parte Relief]

Exhibit 3 None [Brief Not Required]

Exhibit 4 Certificate of Service

Exhibit 5 None

Exhibit 6 None

EXHIBIT 1 – PROPOSED ORDER

**UNITED STATES BANKRUPTCY COURT
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**EX PARTE ORDER AUTHORIZING THE CITY OF DETROIT
TO FILE A BRIEF IN EXCESS OF THE PAGE LIMIT**

This matter coming before the Court on the *Ex Parte Motion of the City of Detroit for Entry of an Order Authorizing a Brief in Excess of the Page Limit*, and the Court finding good cause for the entry of this Order; and the Court being fully advised in the premises;

THE COURT ORDERS THAT the page limit on the *Reply in Support of Its Motion to Enforce Plan of Adjustment and Require 30-Year Amortization of the UAAL in the Police and Fire Retirement System Pension Plan* is increased from seven pages to 22 pages.

EXHIBIT 2 – NONE

EXHIBIT 3 – NONE

EXHIBIT 4 – CERTIFICATE OF SERVICE

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 22, 2022, he filed a copy of the foregoing *Ex Parte Motion of the City of Detroit for Entry of an Order Authorizing a Brief in Excess of the Page Limit* with the Clerk of the Court via the Court's ECF electronic filing system which will provide notice of the filing to all registered participants in this matter.

Dated: October 31, 2022

MILLER, CANFIELD, PADDOCK AND
STONE, P.L.C.

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EXHIBIT 5 – NONE

EXHIBIT 6 - NONE